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bcc

Subject Northern Victor Pile A Clean-up

Margo,

As I mentioned in my voice-mail, Cara and Gina asked that Icicle bring you up to speed on the clean-up operations for Pile A in Udagak Bay, and to ask you to decide what to do next. Since you are out of the office Thursday and Friday, I decided to e-mail you. Here's the situation.

In late August, Cara worked successfully to have the Pile A cleanup separated out from the enforcement action so that the clean-up work could take place in late fall of 2006. On September 5, we applied for a clean water variance from ADEC, followed by other approvals from EPA, ADEC, the Corps, and a coastal zone OK in Alaska. The final approval, from the Corps, was received November 17 and we gave Dan Magone the final go-ahead. He had been doing preparatory work, but wasn't able to go to the site until December 9. Since then he has been dredging the site, with several significant interruptions due to equipment failures and bad weather. About a week ago, we and he believed he was close to finishing. Then, late last week, he was using a large rake, suspended from a vessel, to rake the remnants of Pile A into a mound that he could pick up with the clamshell. He dove on the site to see everything and found that the raking had uncovered a bone layer a few hundred feet south of Pile A, closer to the head of the bay and further away from the Northern Victor.

Magone began to clean up that pile and then had to return to Dutch Harbor because of weather. He contacted us and explained what he had found (we don't have radio contact with him while he is on site; we can only radio the Northern Victor and have a message taken to him by skiff). He says that this pile is further inshore than Pile A and is not contiguous to Pile A. He says it is covered by about a twelve-inch layer of clay and silt, whereas Pile A has only a couple of inches. It appears to have larger bones, probably from cod, which are not in Pile A. The center of Pile A is about 340' from the center of this older pile. The older pile is about 500 feet from the spot where the Northern Victor's stern was anchored while Pile A was deposited. For 1991, the Victor was anchored with the stern pointing into shallower water at the head of the bay. After that, it was swung 180 degrees so that the stern pointed to sea. The bow anchor remained in the same place (it is quite large, heavy, and expensive and is firmly on the seabed).

I spoke with P.J. Kuttel, the former owner of the Northern Victor, this morning and again this afternoon. He said that the Northern Victor could not have deposited waste at that older pile site because of the distance to the Northern Victor's mooring and because the Victor didn't even have hose or pipe to run that far from the ship. He said that a crab and cod processor named the Aleutian Monarch processed at that point in the late 70's until either it or its bunkhouse barge Xanadu had a serious fire. He said that the Royal Sea, now the C/P Katie Ann, anchored and

processed there in the 1980's and that Russian longliners and gillnetters processed there in the early 90's. He believes that the older waste pile was deposited by the Aleutian Monarch. He believes that the Aleutian Monarch operated further toward the head of the bay because it was anchored to shore. The Aleutian Monarch left its shore anchors in place and the Northern Victor picked them up, carried them to deep water, and used them as part of its anchoring system to the seabed. From the location of its shore anchors, he states that the Aleutian Monarch was further into shallower water at the head of the bay.

Finally, he told me that the Victor did process cod in 1991, but that it did not discharge waste during cod processing because all of the waste went to the fishmeal plant. The volume of cod being processed was significantly less than the volume of pollock, meaning that the meal plant could process everything from cod. Cod and pollock were processed in separate seasons in 1991. If there are cod bones in the older pile, he believes they did not come from the Northern Victor.

At this point, Magone is in Dutch Harbor. He is going to Udagak Bay tonight to bring his equipment back to Dutch. He will do a dive on both Pile A and the older pile, determine the relative locations of the two piles, and bring samples of bones from both piles. We have told him not to do further work until we determine what we should do. His rake needs repairs anyway, which will take several days.

I believe that this newly discovered pile was not deposited by the Northern Victor, but is much older. I hope to have more information from Magone tomorrow, at least on more specific coordinates of the two piles, and perhaps on the size and types of bones in the pile. In addition to information from Magone, I have calls out to other people in the industry to try to get information on the operation of the Aleutian Monarch.

We will need a decision from you on what to do about this older pile, if anything. As I get further information, I will send it on.

Terry